## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ROBERT M. DUKETT : CHAPTER 13

Debtor

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant

VS.

ROBERT M. DUKETT

: CASE NO. 5-22-bk-00714 Respondent

## TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 13th day of June, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. The plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2D and 2G of the plan.

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: /s/Agatha R. McHale

Attorney for Trustee

## **CERTIFICATE OF SERVICE**

AND NOW, this 13th day of June, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Poka, Esquire 103 Steven Court Monroe, NY 10950-4522

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee